

CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 8/16/16	NEED RESPONSE BY: 8/23/16
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Santa Barbara	
3. PHONE NO.:	7. SUBJECT: Reasonably Anticipated Income (RAI)	
4. REGULATION CITE(S):	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 12-25, ACIN I-45-11, ACL 13-17	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

A worker is doing a CF recertification and interviewing the client over the phone. The client reports a new job and informs the worker that income is reasonably anticipated for the upcoming SAR payment period. The client tells the worker the rate of pay, start date and hours. The worker has all the information needed to prospectively budget the income for the upcoming SAR payment period.

Question: Can the worker take the client's statement for the new job and enter it in the budget since the income is reasonably anticipated?

10. REQUESTOR'S PROPOSED ANSWER:

No. The worker needs to verify the new job information before entering it in the budget.
 Per ACL 13-17: Reported information is considered 'VUR' when the information is not questionable. Changes that cannot be verified by client statement alone are: Income; Medical costs for a deduction; Legal obligations to pay child support and the amount paid.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

The previous PI response, provided on 8/22/16, has been revised as follows:

In the scenario, the client verbally provided information about a new job with a start date within the upcoming SAR payment period, including rate of pay and hours. Income changes anticipated within the upcoming SAR payment period are considered "reasonably anticipated income". This information shall be used as an indicator of the income that will be available during the upcoming SAR payment period and can be used in the budget calculation. If the CWD can determine that all three conditions listed below have been met, additional verification is not necessary.

(continued on next page)

FOR CDSS USE

DATE RECEIVED: 8/16/2016	DATE RESPONDED TO COUNTY/ALJ: Revised 10/26/2016 AF
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CALFRESH (CF) PROGRAM **REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST:	NEED RESPONSE BY:
	6. COUNTY/ORGANIZATION:	
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2. REQUESTOR NAME:	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s).	
3. PHONE NO.:		
4. REGULATION CITE(S):		

Per ACL 12-25, page 26, if an AU/household anticipates receipt of new income from a new source in the upcoming SAR Payment Period, such as a new job or UI benefits, this income shall only be considered reasonably anticipated if the CWD determines that:

1. The AU/household verifies that the income has been or will be approved or authorized within the upcoming SAR period, or the household is otherwise reasonably certain that the income will be received within the SAR period.
2. The anticipated amount of the income is known and verified, or the AU/household is otherwise reasonably certain of the amount of the income; and
3. The start date of the income is known and verified, or the AU/household is otherwise reasonably certain of the start date of the income.

If a household anticipates new income in the upcoming SAR Payment Period, but does not have reasonable certainty of the data and amount expected to be received, this income cannot be considered reasonably anticipated and shall not be used in the budget calculation.

Income information provided on the CF 37 Recertification for CalFresh Benefits must be verified. Per ACIN 1-45-11, page 4, "Gross income must be verified by the household through wage stubs, a letter from the employer, award letter, applicant IEVS, etc. (MPP Section 63-300.5(e)(1)). However, if verification of income has been unsuccessful after exhausting all attempts because the person or organization providing the income has failed to cooperate with the household, the CWD shall determine an amount to be used for the purpose of eligibility determination based on the best available information, which may include an affidavit completed by the household."

If new income exceeds the IRT mid-period, then the recipient would have to report it and benefits will be recalculated as necessary. Per ACL 13-17, a mid-period report of a change in income not over the IRT must be verified before the CWD can act within the period.